

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LEIGHTON TECHNOLOGIES LLC,

Plaintiff,

vs.

OBERTHUR CARD SYSTEMS, S.A. and  
OBERTHUR CARD SYSTEMS OF  
AMERICA CORPORATION,

Defendants.

OBERTHUR CARD SYSTEMS, S.A. and  
OBERTHUR CARD SYSTEMS OF  
AMERICA CORPORATION,

Counterclaim Plaintiffs,

vs.

LEIGHTON TECHNOLOGIES LLC,  
GENERAL PATENT CORPORATION  
INTERNATIONAL, GENERAL PATENT  
CORPORATION, and IP HOLDINGS LLC,

Counterclaim Defendants.

Case No: 04 CV 02496 (CM) (LMS)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure and in accordance with the Court's Individual Rules of practice, and upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss for Lack of Standing, Declaration of Edward DeFranco dated November 29, 2006, and Statement of Material Facts Pursuant to Local Civil Rule 56.1, all exhibits and documents mentioned therein, and upon the pleadings and all prior proceedings in this matter, defendants Oberthur Card Systems, S.A. and Oberthur Card Systems of America Corporation (collectively "Oberthur") hereby move this Court, before the Honorable Colleen McMahon, for an order (i) dismissing this case because

Plaintiff Leighton Technologies LLC lacks standing and (ii) granting such other and further relief as the Court deems just and proper.

DATED: November 29, 2006

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

By: /s/ Edward J. DeFranco

Edward DeFranco (ED-6524)

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on this 29th day of November, 2006.

/s/ Edward J. DeFranco (ED-6524)